

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 18-cr-30051-MGM
)
 (1) GREGG A. BIGDA and)
 (2) STEVEN M. VIGNEAULT,)
 Defendants.)

GOVERNMENT'S ASSENTED TO MOTION FOR A PROTECTIVE ORDER

The United States of America, by Andrew E. Lelling, United States Attorney, respectfully submits this Motion for a Stipulated Protective Order and states as follows:

The United States is in the process of producing discovery in the automatic discovery process. The United States and defendant Gregg A. Bigda, through his counsel, Matthew D. Thompson, Esq., have agreed to the entry of the attached protective order to ensure that discovery information is not unnecessarily disseminated, that sensitive information is filed under seal, and that access controls are in place. The parties agree that the attached order is in the interests of justice.

WHEREFORE, for the reasons stated herein, the Government, with the assent of counsel for the defendant, Matthew D. Thompson, Esq., respectfully requests that the Court enter the Protective Order attached to this motion.

Respectfully submitted,

ANDREW E. LELLING
UNITED STATES ATTORNEY

By: /s/ Deepika Bains Shukla
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CERTIFICATE OF SERVICE

December 7, 2018

I hereby certify that this document was filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Deepika Bains Shukla
Deepika Bains Shukla
Assistant U.S. Attorney